

**FILED**

JAN 27 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHARLES ADAMS,

Defendant.

**4:22CR00027 HEA/JMB**

No.

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

On or about September 12, 2019, within the Eastern District of Missouri, the defendant,

CHARLES ADAMS,

made or caused to be made a false statement and representation of material fact to the Social Security Administration, in an application for disability determination with the Social Security Administration, to wit: **CHARLES ADAMS** represented to the Social Security Administration, in a Function Report as part of a disability benefits application, that his medical conditions affected his abilities to lift, squat, bend, stand, walk, and sit, when in truth and in fact, **CHARLES ADAMS** regularly engaged in these activities at a gym where he lifted weights.

In violation of Title 42, United States Code, Section 408(a)(2).

**COUNT TWO**

From on or about October 1, 2017, continuing until on or about November 1, 2021, within the Eastern District of Missouri, the defendant,

**CHARLES ADAMS,**

did embezzle, steal, purloin, or knowingly convert to his use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$75,510.29 in the form of Veterans Administration Disability benefit payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING,  
United States Attorney

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DIANE E.H. KLOCKE, #61670MO  
Special Assistant United States Attorney